

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

LIBRADA JIMENEZ

VERSUS

**UNDERWRITERS AT LLOYD'S OF
LONDON SUBSCRIBING TO POLICY
NUMBER AGL001334-00 and JOHN BELICH**

§
§
§
§
§
§
§
§
§

Case No.: [2:17-cv-00020-AM-CW](#)

JOINT STIPULATION OF DISMISSAL

1. Plaintiff and Defendants file this Joint Stipulation of Dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

2. Plaintiff is Librada Jimenez. Named Defendants are Certain Underwriters at Lloyd's, London and John Belich.

3. On January 17, 2017, Plaintiff filed suit against Defendants in the 365th Judicial District Court, Zavala County, Texas. On April 12, 2017, Defendant Underwriters removed this cause to the United States District Court for the Western District of Texas, Del Rio Division.

4. Plaintiff moves to dismiss the suit with prejudice.

5. Defendants Underwriters and Belich, who have answered, agree to dismissal.

6. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.

7. A receiver has not been appointed in this case.

8. This case is not governed by any federal statute that requires a court order for

dismissal of the case.

9. Plaintiff has not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.

10. This dismissal is with prejudice.

Respectfully submitted,

PREIS PLC

BY: /s/ Frank A. Piccolo

Frank A. Piccolo

TX Bar No. 24031227

SD No. 30197

fap@preisplc.com

24 Greenway Plaza, Suite 2050

Houston, Texas 77046

Telephone: (713) 355-6062

Facsimile: (713) 572-9129

ATTORNEY IN CHARGE FOR DEFENDANTS

OF COUNSEL:

PREIS, PLC

Kenneth H. Tribuch

State Bar No.: 24054520

ktribuch@preisplc.com

Caroline Thomas Webb

State Bar No.: 24051497

cwebb@preisplc.com

24 Greenway Plaza, Suite 2050

Houston, Texas 77046

Telephone: (713) 355-6062

Facsimile: (713) 572-9129

GRAVELY & PEARSON, L.L.P.

BY: Matthew R. Pearson*
Matthew R. Pearson
State Bar No. 00788173
mpearson@GPLawfirm.com
Jonathan C. Lisenby
State Bar No. 24072889
jlisenby@GPLawfirm.com
425 Soledad, Suite 600
San Antonio, Texas 78205
Telephone: (210) 472-1111
Facsimile: (210) 472-1110

COUNSEL FOR PLAINTIFF

*Signed with permission

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record in this proceeding in accordance with the Federal Rules of Civil Procedure on this the 7th day of August, 2018.

/s/ Frank A. Piccolo
Frank A. Piccolo